

and asked him to follow-up on it, which Ickes agreed to do.³¹² Ickes testified that he has no

³¹²Schneider's explanation of his request to Ickes, and what Ickes said in response, has varied significantly over time. During his September 1997 deposition in the Wisconsin civil lawsuit concerning Hudson, Schneider testified:

[I said,] 'I understand that you've been in contact with Pat O'Connor about some Indian casinos in Wisconsin,' at which point in time [Ickes] acknowledged that he had. And I said, you know, from my understanding of the issue, you know, 'You ought to take it seriously.' And he said that he had told Pat that he'd look into it, and I said, 'I appreciate that, but you really ought to.' And at that point in time he said that he would. . . .

Id. at 17.

* * * *

He [O'Connor] had said that he had explained to Harold what he wanted. . . . So from my point of view, I don't know what he wanted Harold to do and I didn't say it. I simply said, 'Look, you've had conversations.' Harold admitted, I mean he said that he did, and at that point in time the substance was there and I was just really urging him to follow through with what he was going to say because that too often doesn't happen. . . . [M]y charter was to try to get the White House to take what [O'Connor] had laid out seriously. . . .

Id. at 19-20.

* * * *

He said, 'I'll follow through with it,' I mean almost exactly those words. And it just – again, we had a relationship which – Harold is not someone to pull a lot of punches, and we had a relationship that if he said he was going to do something he'd do it. But he did – I mean he specifically, as I said a few minutes ago, he recalled the conversations and contact with Pat, so at that point in time it was – there was a lot of stuff that was unsaid – unstated. And that's why when I walked away I sort of – I was able to say back to Pat, 'He will follow through.'

Id. at 25. Later that year, in his House Committee deposition, Schneider swore:

I asked him [Ickes] if he had talked to Pat about the dog track, the Indian and dog track issue. He recalled that he had and said that he had told Pat that he was going to look into it. I said to Harold that I thought that it deserved looking into and I would appreciate it if he would.

Schneider House Dep. at 15. Yet, during this investigation Schneider stated that he simply
(continued...)